

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

1600 PACIFIC LANDLORD, LLC.

Plaintiff,

V.

ATLANTIC SPECIALTY INSURANCE
COMPANY, INTERNATIONAL
MARINE UNDERWRITERS, INC.,
AND ONEBEACON INSURANCE
GROUP, LLC.

Defendant

CIVIL ACTION NO. 3:15-CV-03583

JOINT STIPULATION OF DISMISSAL WITHOUT PREJUDICE

1. Plaintiff and Defendants file this Joint Stipulation of Dismissal without Prejudice as to Defendants International Marine Underwriters, Inc. and OneBeacon Insurance Group, LLC, under Federal Rule of Civil Procedure 41(a)(1)(A)(ii).

2. Plaintiff is 1600 Pacific Landlord, LLC. Defendants are Atlantic Specialty Insurance Company, International Marine Underwriters, Inc., and OneBeacon Insurance Group, LLC.

3. On September 17, 2015, Plaintiff filed suit against Defendants in the 101st Judicial District Court of Dallas County, Texas. On November 5, 2015, Defendants removed this cause to the United States District Court for the Northern District of Texas — Dallas Division.

4. Plaintiff moves to dismiss the suit without prejudice only as to Defendants International Marine Underwriters, Inc. and OneBeacon Insurance Group, LLC. Defendant Atlantic Specialty Insurance Company will remain in the suit.

5. The only Defendant who has served an answer is Atlantic Specialty Insurance Company, and it agrees to the dismissal.

6. This case is not a class action under Federal Rule of Civil Procedure 23, a derivative action under Rule 23.1, or an action related to an unincorporated association under Rule 23.2.

7. A receiver has not been appointed in this case.

8. This case is not governed by any federal statute that requires a court order for dismissal of the case.

9. Plaintiff has not previously dismissed any federal or state court suit based on or including the same claims as those presented in this case.

10. This dismissal is without prejudice.

Respectfully submitted,

By: /s/ Michael S. Alfred

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